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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
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11 UNITED STATES OF AMERICA,)

Case No.: 2:10-cr-192-JCM-RJJ

12 Plaintiff,)

13 vs.)

STIPULATION FOR PROTECTIVE ORDER

14 AUNDREA VALERIO,)

15 Defendant.)
16

17 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
18 United States Attorney for the District of Nevada, and Kathryn C. Newman and Sarah E.
19 Griswold, Assistant United States Attorneys, counsel for the United States, and Jacqueline Naylor,
20 counsel for defendant AUNDREA VALERIO, that this Court issue an Order protecting from
21 disclosure to the public any discovery documents containing the personal identifying information
22 such as account numbers, Social Security numbers, drivers license numbers, dates of birth, Email
23 addresses, or physical addresses, of participants, witnesses and victims in this case. Such
24 documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

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1 1. Protected Documents which will be used by the government in its case in chief
2 include personal identifiers, including account numbers, Social Security numbers, drivers license
3 numbers, dates of birth, Email addresses, and physical addresses, of participants, witnesses, and
4 victims in this case.

5 2. Discovery in this case is somewhat voluminous. Many of the documents include
6 personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims
7 would prevent the timely disclosure of discovery to defendants.

8 3. As part of its discovery production, the United States may provide Protected
9 Documents to Defendant without redacting the personal identifiers of participants, witnesses, and
10 victims, with the possible exception of certain materials it reserves the right to produce in redacted
11 form.

12 4. Access to Protected Documents will be restricted to persons authorized by the
13 Court, namely Defendant, attorneys of record, and their associated counsels, paralegals,
14 investigators, experts, and secretaries employed by the attorneys of record and performing services
15 on behalf of Defendant.

16 5. The following restrictions will be placed on the above-designated individuals
17 unless further ordered by the Court. The above-designated individuals shall not:

18 a. make copies for, or allow copies of any kind to be made by any other
19 person of Protected Documents, or allow the Protected Documents to be otherwise disseminated;
20 b. allow any other person to read Protected Documents; and
21 c. use Protected Documents for any other purpose other than preparing to
22 defend against the charges in the Indictment or any further superseding indictment arising out of
23 this case.

24 6. Defendant's attorneys shall inform any person to whom disclosure may be made
25 pursuant to this order of the existence and terms of this Court's order.

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7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as account numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, and physical addresses during the trial of this matter.

8. Upon conclusion of this action, Defendant's attorneys shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as account numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, and physical addresses within a reasonable time, not to exceed thirty days after Defendant has exhausted all appellate rights.

DANIEL G. BOGDEN
United States Attorney

/s/ Sarah E. Griswold
KATHRYN C. NEWMAN
SARAH E. GRISWOLD
Assistant United States Attorneys

April 20, 2011

DATE

/s/ Jacqueline Naylor
JACQUELINE NAYLOR
Counsel for Defendant
AUNDREA VALERIO

April 20, 2011

DATE

ORDER

IT IS SO ORDERED this 21st day of April 2011.


UNITED STATES OF KENTUCKY JUDGE